

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**NOTICE OF RECLAMATION DEMAND OF JETRICH CANADA LTD**

**PLEASE TAKE NOTICE** that Jetrich Canada Ltd. (“**Jetrich**”), through its undersigned counsel, hereby files this notice of delivery of a written demand (the “**Demand**”) for reclamation of goods pursuant to 11 U.S.C. § 503 and 546(c), and applicable non-bankruptcy law, upon Big Lots Stores, LLC, as successor in interest to Big Lots Stores, Inc., and its affiliated debtors (collectively, the “**Debtors**”) to reclaim certain assets (the “**Goods**”) that are subject to reclamation. The Goods were manufactured and sold to Big Lots Stores, LLC, as successor in interest to Big Lots Stores, Inc., in the ordinary course of Jetrich’s business and delivered to and received by the Debtors during the forty-five (45) day period prior to the filing of the above-captioned chapter 11 cases. Jetrich believes the Debtors were insolvent at the time that the Debtors received delivery of the Goods. Jetrich attaches as **EXHIBIT A** and incorporates herein by reference a copy of its formal reclamation demand dated September 18, 2024, which has been delivered to the Debtors and their counsel.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

**PLEASE TAKE FURTHER NOTICE** that as part of its demand for reclamation, Jetrich is demanding that the Goods be segregated, identified, and not be commingled with any other goods.

**PLEASE TAKE NOTICE** that Jetrich reserves all of its rights and remedies under Title 11 of the United States Code (as amended, the “**Bankruptcy Code**”), the Uniform Commercial Code, and any other applicable law, including the right to amend and/or supplement this Notice and to maintain that Jetrich has title to the Goods. Nothing herein shall be deemed or constitute a waiver of, and Jetrich expressly reserves any and all rights, claims, remedies, interest, and defenses, whether at law or in equity, including but not limited to Jetrich’s right to an allowed administrative expense claim under section 503(b)(9) of the Bankruptcy Code or under any other applicable federal or state law. In addition, the filing of this Demand is not a consent by Jetrich to submit to the jurisdiction of this Court with respect to the subject matter of the Demand or any objection or other proceeding in the above-captioned case against or otherwise involving Jetrich.

Dated: October 2, 2024  
Wilmington, Delaware

**WOMBLE BOND DICKINSON (US) LLP**

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